

United States Bankruptcy Court
District of New Jersey

In re: Gerard M. Upright, Jr.,)	
)	
)	Case No. 15-22985-RDD
)	
)	Chapter 7
Last four digits of Social Security or TIN: 0379)	

NOTICE OF MOTION TO DISMISS CHAPTER 7 PROCEEDING

Gerard M. Upright, Jr. has filed these papers with the Court to withdraw his bankruptcy petition.

Your rights may be affected. Please read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have one you may wish to consult with one.

If you object to the relief requested you must indicate so to the Court in writing. If you want the Court to grant a hearing you must request one in writing.

Send papers to: United States Bankruptcy Court
 Southern District of New York
 300 Quarropas Street
 White Plains, NY 10601

You must copy movant's attorney:

David M. Schlachter, Esq.
Law Offices of David M. Schlachter, LLC
8 Carefree Lane
Suffern, NY 10901

If there is no objection then the relief requested may be granted.

Date:

By:
David M. Schlachter, Esq.
August 24, 2015

United States Bankruptcy Court
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In re: Gerard M. Upright Jr.,)
)
) Case No. 15-22985-RDD
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Last four digits of Social Security or TIN: 0379)

Motion to Dismiss Chapter 7 Proceeding

Gerard M. Upright Jr. has filed these papers with the Court to withdraw his bankruptcy petition.

I, David M. Schlachter, Esq., am an attorney licensed in this district and do state under penalty of perjury as follows:


1. I am the attorney for Debtor in this matter and know these facts by talking to Debtor and a review of the file.
2. Debtor would like to withdraw his bankruptcy petition because the circumstances that led him to file a bankruptcy petition have since changed.
3. The bank has agreed to work with Debtor to renegotiate the terms of Debtor's loan.
4. This renegotiation will render Debtor financially stable.

WHEREFORE, Debtor, respectfully request an Order issuing the following relief:

- A. The Court withdraw the bankruptcy petition;
- B. Other such relief as the Court deems appropriate.

Respectfully submitted:
Suffern, NY

August 24, 2015


By _____

David M. Schlachter, Esq.

LAW OFFICES OF
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